

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

MICHAEL COREY JENKINS, et al.,

Plaintiffs,

Civil Action

vs.

No. 3:23-cv-374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, et al.,

Defendants.



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THE REPORTER: So we are on record. The time now is 10:11 a.m., and Mr. Godfrey, may I get you to raise your right hand, please?

MR. GODFREY: Yes, ma'am.

THE REPORTER: Do you affirm under penalty of perjury that the testimony you're about to give will be the truth, the whole truth and nothing but the truth?

THE DEPONENT: I do, ma'am.

THE REPORTER: Thank you. All right. Will each attorney please state your name and whom you represent for the record?

MR. SHABAZZ: Okay. My name is Attorney Malik Shabazz, S-H-A-B-A-Z-Z, and I'm an attorney for the Plaintiff in this matter.

MR. WALKER: Trent Walker, attorney for the Plaintiffs in this matter.

MR. DARE: Jason Dare. I am representing Rankin County and Sheriff Bryan Bailey in this

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1           A.     1975, after graduating for college, I went  
2 to work for the BIBB, B-I-B-B County Sheriff's  
3 Office in Macon, M-A-C-O-N, Georgia. Of course, all  
4 hired as start in the jail, and you work your way  
5 through the dispatching into the road.

6                     I worked there from 1975 to 1981. In  
7 1981, I applied to and was hired by the Georgia  
8 Bureau of Investigation as a special agent for them.  
9 I worked for them just under three years. In 1984,  
10 June 4th of 1984, I was sworn into the Federal  
11 Bureau of Investigation as a special agent trainee.

12                    I completed the FBI Academy, Quantico,  
13 Virginia, and then was assigned to field work. I  
14 left the -- I left the FBI in 2010, May 31st of  
15 2010, as I aged out at 57. After that, worked as --  
16 I did background investigations for the FBI on a  
17 contract basis. I also worked for the Mississippi  
18 Bureau of Investigation for a period of 18 to 24  
19 months on cold case homicides as a contract  
20 investigator. And then started working part-time at  
21 --

22           **Q.     Slow down for one second. Slow down for**  
23 **one second.**

24           A.     Yes, sir.

25           **Q.     Let's back up for a minute.**

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1 Q. Okay, at the MBI. And then that brings us  
2 up to Rankin County; is that correct?

3 A. Yes. Yes, sir.

4 Q. Okay. Now what were you -- what were you  
5 recruited to do at Rankin County by Sheriff Bailey?

6 A. I had run the SWAT team for the FBI, the  
7 local office team. I had -- was a tactical  
8 instructor, a firearms instructor, things along  
9 those lines. So I was brought over to -- to one is  
10 the SRT team, the Special Response Team. I was  
11 brought over to run the firearms program and  
12 basically help with training and, of course, I  
13 pretty much did anything he wanted me to do.

14 In fact, if somebody needed help on an  
15 interview, I was glad to do that. Pretty much just  
16 anything they wanted me to do.

17 Q. Okay, okay. So you were brought in to do  
18 SWAT, firearms and what positions -- how long did  
19 you stay at Rankin County?

20 A. Ten years.

21 Q. How long did you --

22 A. About at ten years, yes sir.

23 Q. Okay. So you left in -- you left in what  
24 year? When did you leave?

25 A. Last November.



1 Q. November of 2023?

2 A. Yes, sir.

3 Q. Okay. That seems to be about 13 years; is  
4 that correct?

5 A. No, sir. I didn't go to work immediately  
6 for Rankin again. I started at MBI, and I was doing  
7 --

8 Q. February 2012?

9 A. About 2012, but at first I was part-time  
10 over there. So I wasn't -- that was not accruing  
11 PERS time, retirement qualifications.

12 So what I did was after I left MBI and I  
13 stopped doing Bibbs, because I got tired of fooling  
14 with federal rules and regulations, I went out there  
15 as a -- I was designated full-time less than 40  
16 hours. That I guess a PERS designator. So I could  
17 -- that qualified me for retirement credits so --

18 Q. Okay. When did you come to full time at  
19 Rankin County?

20 A. Sometimes in 2012 maybe, 2013. I accrued  
21 enough -- I think you have to have ten hours at --  
22 nine or ten to retire from PERS. And so that's --  
23 as soon as I got the time. You've got to contact  
24 Personnel in Rankin, and they could tell you when I  
25 -- all these different things.

1 Q. Okay. Now so you said you came in to help  
2 with the SWAT Department?

3 A. The tactical team, yes sir.

4 Q. And with firearms?

5 A. Yes, sir. Running the program.

6 Q. What other position did you hold in Rankin  
7 County?

8 A. I think if you're looking for a title,  
9 it's probably Training Director, which is kind of  
10 misnomer. I mean there's really -- there's no  
11 Academy, so to speak. There is a -- they have an  
12 Academy there that's basically they run a program at  
13 Rankin for -- reserve, reserve officer program.

14 I didn't participate in that. That was  
15 already up and running by other people there, so I  
16 didn't get involved in it and I helped a little bit  
17 on Internal Affairs investigations. Not many, just  
18 one. They would occasionally ask me to look into  
19 some allegation.

20 Q. Okay. So did you ever serve as an  
21 Internal Affairs officer for Rankin County?

22 A. Again, I would do some. I wouldn't -- I  
23 wouldn't say I was the Internal Affairs  
24 investigator. They really at the time didn't have  
25 one.

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1 Q. They did not have one?

2 A. To the best of my recollection.

3 Q. They did not have an internal  
4 investigation department -- Rankin did not have an  
5 Internal Affairs Department during the time of your  
6 tenure in Rankin, is that right?

7 A. Not a department, no sir. Nobody assigned  
8 full-time to that position, no.

9 Q. Okay. So and -- and so just -- when were  
10 you able to participate in certain investigations?

11 A. When I asked to by the Sheriff.

12 Q. Okay. And when were those occasions?

13 A. Once again you asked this. It's over ten  
14 years, and it's been a while. I've worked several,  
15 and most of them were just the Sheriff would say can  
16 you look into this. There's been an allegation of  
17 this. Can you look into it? I would do a short  
18 investigation, put some interviews together and I  
19 would get the package back to the Sheriff.

20 Q. Okay. So is it fair to say that your  
21 assignment was not formal in that regard but --

22 A. Yeah, yeah. That was probably be a good  
23 statement. Not formal, but I was asked to do them  
24 on occasion.

25 Q. Okay. And do you recall the

1 investigations that you did participate in?

2 A. A few.

3 Q. Do you recall those investigations?

4 A. Sir?

5 Q. Do you recall those investigations?

6 A. A few of them. You would have to ask me  
7 specifics. Generally, I remember one I did on a  
8 correctional officer who was accused of having sex  
9 with a trustee one time, and another one --

10 Q. Do you remember that officer's name?

11 A. No. That was when I first started there.  
12 That was probably back in about 2012. He was a  
13 sergeant in the jail is all I can tell you.

14 Q. Do you remember the deputy's name?

15 A. It was a sergeant in the jail. That's all  
16 I can tell you.

17 Q. Okay. And about how many, just because it  
18 doesn't seem to be that many --

19 A. Right.

20 Q. But in your career, how many  
21 investigations did you participate in?

22 A. Eight, ten. Some of them were just quick,  
23 you know, turnaround things --

24 Q. Okay. Okay. I'm sorry.

25 A. No, that's fine.

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1 Q. Okay. They were -- do you have  
2 documentation that reflects your investigations?

3 A. Not after, no sir. I didn't keep anything  
4 when I left.

5 Q. Okay. And did you participate in  
6 producing documents and records of the  
7 investigations that you did participate in?

8 A. I would prepare a packet and give it back  
9 to the Sheriff, yes. It would mostly be -- it will  
10 just be results of the interviews or anything else  
11 that was involved. Again, maybe eight, ten the  
12 whole time I was there.

13 Q. Okay. And you did -- you did have written  
14 documentation for those eight to ten investigations  
15 you did?

16 A. That would be hard to say. Again, I gave  
17 everything back to the Sheriff.

18 MR. DARE: If I may, I think you are  
19 asking if this witness personally has any, is that  
20 right?

21 MR. SHABAZZ: No, sir.

22 MR. DARE: I want to make sure that the  
23 record was clear. Can you ask that question again,  
24 counsel?

25 BY MR. SHABAZZ:

1 Q. Okay. I'm just asking did he produce  
2 documentation in reference to the eight to ten  
3 investigations that he says he participated in?

4 A. Again, eight to ten is WAG. I did on  
5 occasion, yes sir, if I thought it was necessary.

6 Q. Okay.

7 A. I'll give you a good example if I wouldn't  
8 prepare a document, okay? The Sheriff would come  
9 and say this person called and said this deputy did  
10 something. Was ugly to them on the road, cursed at  
11 or whatever.

12 If I called the person and they didn't  
13 return my call, didn't answer my call or decided  
14 they wanted to pursue it, didn't want to come in and  
15 make full statement or anything like that, I would  
16 just go back to the Sheriff and say they wouldn't  
17 come in and make a statement type thing.

18 Q. Okay. So you wouldn't -- you wouldn't --  
19 would you write anything formal when that happened?

20 A. No. Generally not, no. Again, it was an  
21 informal thing. I was not assigned as the Internal  
22 Affairs investigation. There was no standard  
23 operating procedure that I knew of how to handle an  
24 Internal Affairs investigation. I just tried to  
25 find out what went on and let the Sheriff know.

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1 Q. Okay. So did Rankin County in the times -  
2 - in your tenure, did Rankin County have written  
3 procedures for internal investigations?

4 A. I'm sure there is one in the SOP, but it's  
5 just general. I couldn't quote it.

6 Q. Okay. Okay. Now you said that your --  
7 that you at time to time did internal  
8 investigations; correct?

9 A. Yes, sir. Yes, sir.

10 Q. Okay. Was there an Internal Affairs  
11 officer during your tenure?

12 A. I still don't think there's one full-time.  
13 I think there's a guy that's assigned to do them now  
14 in the Investigative Division. A lot of times what  
15 would happen is a complaint would come -- again  
16 speculation, would come in, an allegation against a  
17 patrol deputy that was rude to a person.

18 That would just be passed to the Chief of  
19 Patrol, who would handle it. It would be passed to  
20 the chief investigator to handle, those type of  
21 things.

22 Q. Okay. Now you -- you left -- when you  
23 left Rankin County, why did you leave Rankin County?

24 A. I had enough time to retire. It was time.  
25 I'm 70 years old --

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1 Q. Okay.

2 A. It isn't what it used to be.

3 Q. Okay. You're familiar with the case of  
4 Michael Jenkins and Eddie Parker; is that correct?

5 A. Is this the shooting? Yes, sir. Yes,  
6 sir.

7 Q. Okay. Did you participate in that  
8 investigation?

9 A. No, sir.

10 Q. Okay.

11 A. I did take the Garrity statements. I took  
12 Garrity statements from each of them at the request  
13 of counsel and the Sheriff.

14 Q. Okay. Can you describe what that is?

15 A. A Garrity statement?

16 Q. Yes. Can you describe what that is?

17 A. It's when you interview -- you interview  
18 the deputy and ask him what happened.

19 Q. Okay. So you did interview each deputy in  
20 the -- in the Michael Jenkins/Eddie Parker matter?

21 A. Yes, sir.

22 Q. Okay. When did you -- when did you  
23 interview them?

24 A. A week later, maybe.

25 MR. DARE: And you can only testify as to



1 what you specifically recall.

2 THE DEPONENT: Yeah. Maybe a week later,  
3 five days later.

4 BY MR. SHABAZZ:

5 Q. Okay. And --

6 A. I don't happen to know, sir.

7 Q. Well, that's okay. But did you produce --

8 A. Yes, sir.

9 Q. -- okay. Did you produce records in  
10 regards to your investigation?

11 A. The interviews, yes sir.

12 Q. Your interviews?

13 A. Yes, sir.

14 Q. Okay. And Rankin County's in possession  
15 of those, those records; is that correct?

16 A. I have no idea. I would assume they  
17 would.

18 Q. Okay. So exactly what did you do with  
19 those deputies?

20 A. Did I do with the deputies?

21 Q. Yeah. When you --

22 A. Nothing. I had them come in, interviewed  
23 them, gave the results to the Sheriff.

24 Q. Gave the results to Sheriff Bailey. Okay.  
25 And you said maybe about a week or so after?

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1 A. That's a guess again. That's been several  
2 years ago now, and I don't particularly remember.

3 Q. Okay. But were you asked to -- did you  
4 reach any findings or conclusions or make any  
5 recommendations based on your interview?

6 A. No, sir. Not my job.

7 Q. Okay. Now when you were SWAT commander,  
8 you say you were a SWAT commander?

9 A. Yes, sir. I was the overall commander,  
10 team leader, whatever you want to call it for the  
11 SRT team, yes sir.

12 Q. Okay. What year was that?

13 A. From the time I started til the time I  
14 left.

15 Q. Okay. So your entire tenure you were a  
16 SWAT commander?

17 A. Yes, sir.

18 Q. Okay. Now were any of the deputies that  
19 were involved in the Michael Jenkins matter --

20 A. Yes, sir.

21 Q. I'm specifically speaking of Christian  
22 Dedmon, Lieutenant Middleton.

23 A. Yes, sir.

24 Q. Brett McAlpin?

25 A. No. He was not on the team. He was on

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1 the team to begin with, but he stepped off the team  
2 when he became Chief Investigator.

3 Q. Okay. I'm going to ask you about each of  
4 them and their involvement with the SWAT team.

5 A. Yes, sir.

6 Q. Okay. Okay. Well, let's just go down.  
7 Was Dedmon a member of the SWAT team while you were  
8 the commander?

9 A. Yes, sir.

10 Q. And was Middleton -- was Middleton a  
11 member of the SWAT team while you were commander?

12 A. Yes, sir.

13 Q. Okay. Do you recall the years for those  
14 two, when they were SWAT team members?

15 A. Middleton, I think, was on the team when I  
16 got there. Dedmon was not. Dedmon tried out for  
17 the team  
18 after I was there, when he came over from Pearl.

19 Q. Okay. He tried out for the team. About  
20 what year was that?

21 A. Anything I would tell you would be a  
22 guess, sir.

23 Q. That's okay. I'm asking for your  
24 recollection.

25 MR. DARE: I would only say don't

1 speculate.

2 THE DEPONENT: Five years after I started,  
3 six years. I don't know when he came from Pearl.

4 BY MR. SHABAZZ:

5 Q. Okay. Mr. McAlpin, was he a member of the  
6 SWAT team?

7 A. He was -- yes sir, he was there. He was  
8 on the team when I got there.

9 Q. Okay. And how long did he serve on the  
10 SWAT team, McAlpin?

11 A. I think he stepped off when he became  
12 Chief Investigator.

13 Q. What year was that?

14 A. I don't know, sir.

15 Q. Approximately.

16 A. Three years before. When did I leave?  
17 This is '20. Maybe four years ago.

18 Q. Roughly around 2019?

19 A. I guess. Again sir, I can't answer that  
20 specifically.

21 Q. That's okay.

22 A. I understand.

23 Q. That's okay.

24 A. I understand.

25 Q. We're putting some approximations here.

1 Okay. So McAlpin served on the SWAT team up til  
2 about 2019; correct?

3 A. Possibly, yes sir.

4 Q. Okay. And what about Deputy Opdyke?

5 A. Yes, sir. He was on. He'd only been on a  
6 couple of years, I think.

7 Q. A couple of years?

8 A. He was one of the newest members of the  
9 team, yes sir.

10 Q. When you arrived?

11 A. No, sir. Before I left.

12 Q. When you left?

13 A. Yes, sir.

14 Q. Okay. Okay. Well, what about Hunter  
15 Elward?

16 A. He was there. He was also on the team,  
17 yes sir.

18 Q. He was a member of the SWAT team?

19 A. Yes, sir.

20 Q. And what years was he a member?

21 A. It would be about a year longer than  
22 Opdyke, I think. Maybe two.

23 Q. So, okay. Maybe roughly around 2019-2020?

24 A. I guess. This is all -- should be all in  
25 their personnel files.

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1           **Q.     Okay. I think you said Dedmon had to --**  
2           **did you say he had to qualify for the SWAT team?**

3           A.     Had to try out. Yes, sir. Anybody that  
4 comes in and wants to be on the team had to go  
5 through a tryout. Unless you're on another team  
6 that has the same standard operating procedures and  
7 have been to the same schools that Rankin County  
8 sends their guys to.

9           **Q.     Okay. And so did -- were you -- were you**  
10          **the person that determined the qualifications of the**  
11          **deputy to join the SWAT team?**

12          A.     We had come up -- basically, we had -- the  
13 basic PT test was adopted from the one the FBI uses,  
14 and then they do a few other things. Some team-  
15 building exercises, some firearms, check their  
16 firearms score, check their team-building skills,  
17 and then the decision will be made mostly by the  
18 whole team.

19          **Q.     Okay. Well, what was the PT test?**

20          A.     So you have to be outstanding. It's a --  
21 consists of a mile and a half run, a 40 yard spring  
22 with body armor carrying a weapon, a certain amount  
23 of pullups wearing body armor, a shuttle run, and  
24 that was about it.

25          **Q.     Okay. Okay. In terms of what other**

1 **qualifications --**

2 A. They certainly had to pass the firearms,  
3 firearms scores.

4 **Q. Okay. What else?**

5 A. That was pretty much it to be -- to be  
6 going to the interview and pass the interview that  
7 was run by the whole team.

8 **Q. Okay. And you were -- were you the person**  
9 **to determine whether they joined the SWAT team?**

10 A. No, sir. I certainly had a -- I had a say  
11 in it, but it was a team decision.

12 **Q. Okay. Who was that team?**

13 A. The whole team.

14 **Q. Okay. Which was? Which --**

15 A. The whole team.

16 **Q. Okay. Who was the whole team?**

17 A. Whoever was on the team at that time when  
18 they tried out. Because consistent --

19 **Q. Was Sheriff Bailey a part of that team?**  
20 **Was Sheriff Bailey a part of that team?**

21 A. No.

22 **Q. Okay. So who would -- who would typically**  
23 **be a part of that team?**

24 A. I'm trying to answer. It would be the SRT  
25 team. The whole team would come out for the

1 **investigating allegations against SWAT team members?**

2 MR. DARE: I'm going to object to the  
3 form, but you can answer if you know.

4 THE DEPONENT: No, sir. I don't ever  
5 remember us being investigated. If it was an  
6 officer-involved shooting, MBI came in and worked  
7 it.

8 BY MR. SHABAZZ:

9 Q. Okay. But I'm saying other -- other,  
10 other allegations.

11 A. You have to talk to the Sheriff, sir.

12 Q. Okay. And so what was the Sheriff's role  
13 in supervising the SWAT team?

14 A. On a day-to-day basis? Not much. I  
15 generally handle the day-to-day workings of anything  
16 that the SRT team did. Of course, on any kind of  
17 emergency callout, the Sheriff was generally on  
18 scene commander. He is the Sheriff.

19 Q. Okay. So now on a day-to-day basis, how  
20 often -- how often did you all report to Sheriff  
21 Bailey on the actions of the SWAT team?

22 A. I'm not really clear.

23 Q. How often did you meet with Sheriff Bailey  
24 in terms of the actions of the SWAT unit?

25 A. Not many times at all. I mean again, it's



1 a small -- the Sheriff would know if we've been out.  
2 We would go in now and tell him what had happened or  
3 something along those lines. The team was not that  
4 active.

5 Q. Hold one second. Now you said the Sheriff  
6 would know --

7 MR. DARE: He was in the middle of  
8 responding to your earlier question. If you can  
9 allow him to finish to your question, and then ask  
10 your next one. Were you through?

11 THE DEPONENT: Yes.

12 MR. SHABAZZ: Go ahead.

13 THE DEPONENT: Just ask the next question,  
14 counsel. Let me -- let me rift off here just a  
15 minute. The SRT team mostly was for high risk  
16 situations, any kind of hostage situation, any kind  
17 of barricade situation, fugitives, searches, stuff  
18 along those lines, emergency situations.

19 The team was not active on a day-to-day  
20 basis. It was not a full-time entity. The  
21 assignment to the SRT was not a full-time position.  
22 It was an ancillary duty. We may go out -- some  
23 months we didn't do anything. Some months we may  
24 have two or three callouts.

25 BY MR. SHABAZZ:

1 Q. Okay. So you had an average of about two  
2 or three callouts per month?

3 A. Maybe. We could go several months, excuse  
4 me just a minute. Can I get a glass or a bottle of  
5 water?

6 MR. DARE: Yeah.

7 THE DEPONENT: Can I step away?

8 MR. DARE: Let's go off the record real  
9 quick.

10 THE REPORTER: We're off record. The time  
11 now is 10:50.

12 (WHEREUPON, a recess was taken.)

13 THE REPORTER: The time is 10:53, and  
14 we're back on record.

15 BY MR. SHABAZZ:

16 Q. Okay. Did you say FOAC before?

17 A. Yes.

18 Q. Okay. Did you tell -- what is FOAC?

19 A. It's called FOAC. It's Field Office  
20 Administration and Communication. It was how to do  
21 Bureau paperwork. The Bureau has a very rigid --  
22 back in my day, it had a very rigid standard.

23 You had -- you had yellow copies and blue  
24 copies and green copies, and you had to know the  
25 flow of information. And so that was -- and that

1 was actually one of the tougher things that we  
2 studied, because it was so foreign to anything I'd  
3 ever seen before.

4 Q. Okay. So it is a -- is it fair to say  
5 that in your law enforcement career, that you were -  
6 - you were not trained as an Internal Affairs  
7 investigator?

8 A. That would be very correct, sir.

9 Q. Okay. Now did you -- are you familiar  
10 with the case of Damien Cameron?

11 A. Not by name. If you could give me a  
12 little detail.

13 Q. In 2021, Damien Cameron was involved in an  
14 incident with Hunter Elward and --

15 A. I know what you're talking about.

16 Q. Okay. Did you investigate that case?

17 A. No, sir.

18 Q. Did you have any role in that case at all,  
19 in reviewing that?

20 A. No, sir. No, sir.

21 Q. Did Bryan Bailey review any of those -- of  
22 that case with you?

23 A. You'd have to ask Bryan Bailey.

24 Q. Okay.

25 A. I have no idea.

1 Q. Okay. So I mean if in fact Bryan Bailey  
2 said that you had some role in investigating that  
3 case, what would your response be?

4 A. I'd have to see the paperwork or you'd  
5 have to enlighten me on it as to what I did, because  
6 I do not remember it.

7 Q. You don't recall being involved in that  
8 case; correct?

9 A. No sir, I do not.

10 Q. And what -- okay. Do you recall the  
11 Pierre Woods matter? Do you recall Pierre Woods?

12 A. No, sir.

13 Q. Okay. Now, okay. You're not familiar  
14 with the Pierre Woods matter?

15 A. No, sir. If you could give me some  
16 details, I might remember an incident. I don't  
17 remember names.

18 Q. I think the SWAT team -- from my  
19 understanding, the SWAT team was involved in Pierre  
20 Woods' case, and Pierre Woods was shot and killed?

21 A. In Pelahatchie? Yeah. Yes, sir. I was  
22 on scene.

23 Q. You were on the scene in that case?

24 A. Yes, sir.

25 Q. Okay. And did you participate in -- what

1 was your role in the -- in the investigation of what  
2 happened in that matter?

3 A. Did not run anything on the investigation,  
4 sir. It was a OIS. It was investigated by the  
5 Mississippi Bureau of Investigation.

6 Q. Okay. One second.

7 A. Yes, sir.

8 Q. Okay. Now in terms of your knowledge, how  
9 did -- how did Rankin County review the internal  
10 actions of its officers, to ensure that the  
11 Constitution and Rankin County Department policy  
12 were being followed? How did Rankin County -- well,  
13 how did they go about that?

14 A. The Sheriff handled everything. If he had  
15 you do something he wanted to do, he told you.

16 Q. Okay. So you're saying that the Sheriff  
17 handled all reviews of the internal actions of the  
18 officers --

19 MR. DARE: Objection.

20 MR. SHABAZZ: -- to see whether or not  
21 they were involved or compliant with the  
22 Constitution?

23 MR. DARE: Object to form. That's not  
24 what he said.

25 BY MR. SHABAZZ:

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1 Q. Okay. Well, explain that to me again, so  
2 I can understand. How did -- how did Rankin County  
3 review the internal actions of its officers, to  
4 assure that the Constitution and department policy  
5 was being followed?

6 A. I can't answer that question.

7 Q. Okay. But you said -- you can't answer  
8 it?

9 A. I didn't say I wouldn't. I said I can't.  
10 I don't know what the policy was, how it was  
11 handled, that Rankin County handled it.

12 Q. Okay. Well, how did Bryan Bailey handle  
13 it?

14 A. You'd have to ask Bryan Bailey.

15 Q. But just -- previously, you just said that  
16 Bryan Bailey, Bryan Bailey handled all of that?

17 A. He is the Sheriff, sir. He supervises the  
18 whole department. If the Sheriff told me to do  
19 something, I did it. If he told someone else to do  
20 something, I assume they did it.

21 Q. Okay. So if a deputy was accused of  
22 beating a citizen, how did the Sheriff's Department  
23 handle that matter?

24 A. I was never asked to interview -- conduct  
25 any investigation into the beating of anyone that I

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1 can recall. So I can't tell you what was done.  
2 Again, most of the time it was passed to the Chief  
3 Investigator or the Chief Deputy in charge of Patrol  
4 or anything along those lines.

5 Q. Okay. But there was nothing formal? You  
6 don't have a -- was there a formal procedure in  
7 place?

8 A. Not that I know of, sir.

9 Q. Okay. So pretty much you're saying that  
10 whatever Sheriff Bailey said what happened, that's  
11 what would happen? Is that what you're saying?

12 A. Yes. He is the Sheriff.

13 Q. Okay. Now when you said that -- what was  
14 the role of the special investigator?

15 A. I'm not -- I'm not familiar with that term  
16 "special investigator."

17 MR. WALKER: Do you mean "Chief  
18 Investigator"?

19 THE DEPONENT: Chief Investigator?  
20 BY MR. SHABAZZ:

21 Q. Let me look at my chart. Yeah. What was  
22 the -- I'm sorry, strike that. What was the role of  
23 the Chief Investigator?

24 A. He supervised investigations and the  
25 investigators.

1 putting him on the team roster. I mean I don't  
2 really --

3 Q. Okay.

4 A. We did not have a separate file for SRT  
5 members. It was they had their personnel file.

6 Q. Okay. I'm talking about them being  
7 accepted on SRT. Being accepted on SRT by the team  
8 you described, and did this team keep any records or  
9 notes of the people they admitted to the SRT team?

10 A. No, no, no.

11 Q. No records were kept?

12 A. No

13 Q. Okay. In terms of Michael Jenkins and  
14 Eddie Parker, what was your purpose of interviewing  
15 officers involved?

16 A. I was told by the Sheriff and counsel to  
17 conduct a Garrity interview.

18 Q. Okay. And did you reach any findings or  
19 conclusions from your interview?

20 A. Conducted the interview, wrote down their  
21 statement, provided it to the Sheriff.

22 Q. And did you -- did you compile any other  
23 reports as to your views or opinions about what had  
24 happened?

25 A. No, sir. I wasn't asked to do opinions or



1 anything along those lines.

2 Q. Are you -- are you saying that you took --  
3 you took the reports on it?

4 A. Not the report. Their statement.

5 Q. You took their statement only and made a  
6 report?

7 A. I took their statement, compiled them and  
8 gave them to the Sheriff or to you. I don't -- I  
9 mean I passed them on to the Sheriff or the counsel.  
10 I don't remember exactly.

11 Q. Okay. Do you know -- were you the first -  
12 - were you the first official in Rankin to interview  
13 these deputies?

14 A. Not to my knowledge.

15 Q. Okay. Who was the first?

16 A. I don't know, sir. Again, I was not  
17 involved in the investigation.

18 Q. Okay. Well, you just -- you stated that  
19 you -- you interviewed the officers?

20 A. Yes, sir.

21 Q. As part of the -- as part of the  
22 investigation?

23 A. I conducted a Garrity interview with each  
24 individual deputy. I did not --

25 Q. That is -- that is part of the

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1 investigation, isn't it?

2 A. If you'd like to call it that, yes sir.

3 Q. Okay. And you say you were not the first  
4 to interview them?

5 A. I don't know if I was. I don't think so.  
6 I would imagine the people who were on the scene  
7 that night interviewed them.

8 Q. Okay. And you made no reports to Sheriff  
9 Bailey on your assessment of these interviews that  
10 you did?

11 A. I did not provide an assessment. I took  
12 their statement and provided a statement for the  
13 Sheriff.

14 Q. Okay. Then --

15 A. I was not asked what I thought.

16 Q. All right, okay. I understand. All  
17 right. Let me show you what's been marked as  
18 Plaintiff's Exhibit 1. I'm going to put it up on  
19 the screen and --

20 A. Is this the lawsuit?

21 Q. This is the interrogatories provided by  
22 Defendant in this lawsuit.

23 A. Yes, I see it.

24 Q. Okay. Can you -- I want you to -- can you  
25 turn your attention to page number eight of what we

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1 Q. Well, why would you assume that?

2 A. Most departments have them.

3 Q. Did Rankin have one?

4 MR. DARE: Asked and answered.

5 BY MR. SHABAZZ:

6 Q. Okay. Okay. Indulge me for a second.

7 A. Yes, sir.

8 Q. Okay. You said that you were -- you  
9 supervised training at Rankin during your roughly  
10 decade-long tenure; is that correct?

11 A. Yes. You could say that, yes sir.

12 Q. Okay. Could you -- could you describe  
13 your -- your duties and responsibilities in general,  
14 outside of SRT, your training responsibilities  
15 internally?

16 A. Mostly maintain the training records.

17 Q. Okay. You just maintained the records?

18 A. Yes, sir.

19 Q. Okay. Did you -- did you conduct the  
20 training?

21 A. Firearms or something like that. Maybe we  
22 would have something small like that, yes sir. But  
23 I never -- I never was -- never participated in any  
24 department-wide instruction as an instructor.

25 Q. Okay. When you began, who was in -- who

1 actually did the training? Who was in charge of the  
2 training when you came on in Rankin?

3 A. Who's the guy that's -- the counsel.

4 MR. DARE: I can't give you answers.  
5 You've got to testify --

6 THE DEPONENT: Okay. There was a guy who  
7 was an off -- in-house counsel. He kind of ran the  
8 training program then too. I'm just drawing a blank  
9 now. I'm sorry. At 71, I have a little trouble --

10 BY MR. SHABAZZ:

11 Q. So what now? Tell me that -- tell me that  
12 again?

13 A. When I started there, the in-house counsel  
14 also ran the training program.

15 Q. You're talking about an attorney?

16 A. Yes, sir. That would be in-house counsel.

17 Q. Okay. Who would that be?

18 MR. DARE: If you don't recall the name  
19 just --

20 THE DEPONENT: I don't. I mean I know it.  
21 I just can't bring it up right now.

22 BY MR. SHABAZZ:

23 Q. Okay. In-house counsel or lawyer ran the  
24 Rankin training up until when?

25 A. Til he left. Well, no. Kind of after I

1 got there and got my feet on the ground, kind of --  
2 I was in charge of training. Six months maybe, a  
3 year maybe.

4 Q. Okay. And but you don't recall his name?

5 A. It will come to me, and in fact I'll  
6 probably interrupt you in a minute when it pops into  
7 my brain.

8 Q. Okay. That's fine. We can come back to  
9 it. Okay. So after that person, who was in charge  
10 of the training?

11 A. I was nominally in charge of it.

12 Q. Okay. For how long?

13 A. Until I left.

14 Q. And so you were in charge of the training  
15 of the officers, of all of the Rankin deputies for  
16 your -- from when that in-house counsel left up to  
17 the end of your tenure?

18 A. I think I said that.

19 Q. Okay. Now a moment ago, you said that --  
20 that you were reviewing. That means that you  
21 participated in the firearms aspect of the training?

22 A. Well, I ran the firearms program. Yes,  
23 sir.

24 Q. Okay. But now when you say that you were  
25 in charge of the training for your entire tenure,

1 could you give me a further description on your  
2 duties and responsibilities there?

3 MR. DARE: Object to form. You can  
4 answer.

5 BY MR. SHABAZZ:

6 Q. What were your duties -- I'll repeat it.  
7 What were your duties and responsibilities as the  
8 training officer?

9 A. I kind of kept up with the records, and  
10 that was about it.

11 Q. Okay. But who conducted the trainings?

12 A. What kind of training are you talking  
13 about? I mean that's -- that's a -- that runs a  
14 wide gamut. We sent people outside the department.  
15 The last couple of years I was there, we contracted  
16 with the Virtual Academy, which is a private entity,  
17 to provide online training.

18 If they needed DUI training, they went to  
19 any academy that was offering such. A lot of  
20 training offers would be sent through me. I would  
21 get in an email this course is being offered, that  
22 course is being offered, and I would send it out to  
23 the department. Anyone interested, please let me  
24 know.

25 But generally, the Sheriff or the

1 Undersheriff made the decision who would go. I was  
2 mostly just a conduit for that.

3 Q. Okay. And what training -- other than the  
4 firearm training, what trainings did the deputies in  
5 Rankin receive?

6 A. Again, if you wanted to go to a training.  
7 If you as an individual deputy, if you were  
8 interested in something and you heard about or saw a  
9 course being offered, they might ask me to go to  
10 something. They may go to the Sheriff and ask.  
11 They may go to the Undersheriff and ask, and it  
12 would be approved and they would be sent to the  
13 training.

14 Q. Okay. What about specifically for  
15 excessive force training?

16 A. I think they had --

17 Q. Emphasis on excessive force.

18 A. I don't remember. I know I never put on  
19 any kind of in-house personally training on  
20 excessive force. They covered that in basic, I'm  
21 assuming, and I think Jeff Artis came in and put on  
22 a Color of Law school once.

23 Q. Okay.

24 A. Again, this -- I kept records, sir. I  
25 didn't set up most of the training.

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1 Q. Anyone else?

2 A. No. That would just be speculation on my  
3 part.

4 Q. Okay. Did the Department of Justice --  
5 did the Department of Justice interview you in  
6 regards to the operations of the Rankin County  
7 Sheriff's Department?

8 A. This is the first deposition or interview  
9 I have been involved in concerning the Rankin County  
10 Sheriff's Office.

11 Q. Okay. Now in January 2023, you were --  
12 you said you were over training. Does that mean you  
13 were over the Training Division?

14 A. There is no division, sir. It was me.

15 Q. Okay. So you were the one man in charge  
16 of all training?

17 A. Again, I maintained the records.

18 Q. You maintained the records. Now in terms  
19 of the -- I just want to get clear. In terms of  
20 excessive force, was there a specific training  
21 mandate for the deputies to be trained on -- on the  
22 proper use of force?

23 A. We asked them to take a couple of course  
24 on Virtual Academy, and I don't remember any one  
25 particularly named excessive force. But there were



1 some involving civil rights and stuff along those  
2 lines.

3 Q. Did you -- you asked them to take this  
4 course?

5 A. They were assigned to take the course, yes  
6 sir.

7 Q. Every deputy?

8 A. Yes, sir.

9 Q. Okay. What was that training about?

10 A. I'm sorry. What was that?

11 Q. What was the name of that training you  
12 were --

13 A. I can't -- I can't recall the specific  
14 name of it right now. I have to look at the Virtual  
15 Academy roll sheet.

16 Q. And what was the --

17 A. They should be able to provide that. They  
18 should be able to provide that to you.

19 Q. Okay. What was the description? Help me  
20 out with the description of the training.

21 A. Sir, I don't remember. That's four years  
22 ago, close to four years ago, three years ago.

23 Q. Okay. Other than that, any other specific  
24 trainings that were -- that were mandated by Rankin  
25 County that deal with the use of force?

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1 -- he would do a download from their taser, attach  
2 the download data to the use of force report.

3 Q. Okay. Who was responsible for determining  
4 -- determining whether those tasers had been used  
5 appropriately?

6 A. I would assume it would be Chief of Patrol  
7 and in counsel with the Undersheriff and the  
8 Sheriff.

9 Q. The Undersheriff and the Sheriff were  
10 responsible for determining whether that taser had  
11 been used correctly?

12 A. Ultimately, it's always the Sheriff's  
13 decision. I don't really know who's included. I  
14 mean he may ask two or three people. I don't know.

15 Q. But ultimately, that rests on the -- it  
16 comes to the Sheriff; correct?

17 A. He is the Sheriff.

18 Q. Ultimately then, the Sheriff would receive  
19 these taser reports?

20 A. I'm assuming.

21 Q. Okay. And what about firearm use? Whose  
22 responsibility was it to determine whether a firearm  
23 had been used appropriately?

24 A. Again, that would additionally be the  
25 Sheriff.

1 Q. Okay. Okay. So like for example in the  
2 case of Mr. Schmidt, where it's a fact that the  
3 firearm was discharged in the course of interactions  
4 with Mr. Allen Schmidt. Would Bryan Bailey be  
5 notified that that firearm had been used?

6 MR. DARE: Object to form.

7 THE DEPONENT: I don't --

8 MR. SHABAZZ: Would Bryan Bailey know that  
9 a deputy had used that -- discharged his firearm as  
10 in the case of Mr. Schmidt?

11 MR. DARE: My objection was just that it  
12 was a fact that it had been discharged. But I mean  
13 if you know, you can answer.

14 THE DEPONENT: From what I can deduct, I  
15 don't think it was ever reported as a discharge, was  
16 it?

17 BY MR. SHABAZZ:

18 Q. I'm asking you.

19 A. I'm telling you. I don't think it was  
20 ever reported.

21 Q. Okay. Well, you say that all discharges  
22 are reported; correct?

23 A. They're supposed to be.

24 Q. Okay. Well, what is the system to -- to  
25 know whether or not a deputy has discharged their

1 **firearm? Is there a system in place?**

2 A. I don't know how you would do that, unless  
3 you counted their ammo every day when they went on  
4 shift, and counted it every day when they went off  
5 shift, and then check their car and see if they had  
6 extra ammo every day. You kind of have to trust  
7 your people.

8 Q. Okay. So what are you saying? You're  
9 saying that -- what are you saying when you say  
10 that?

11 A. I don't -- I don't know if any department  
12 that has the ability to do that.

13 Q. Okay. But you said that -- did you say  
14 that Sheriff Bailey would be aware of all firearm  
15 discharges?

16 A. If they are reported.

17 Q. Okay. Indulge me one second. And a gun  
18 discharge, does a gun discharge constitute the use  
19 of force?

20 A. Not necessarily.

21 Q. Okay. Can you explain that? Why wouldn't  
22 it?

23 A. If you're at home playing with your  
24 firearm and you shoot your television, that's not a  
25 use of force.

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1 Q. Well, I'm talking about in the line of  
2 duty. Discharge of firearm in the line of duty. Is  
3 that considered the use of force?

4 A. It certainly should be.

5 Q. Okay. And did Rankin County have in place  
6 any policies or procedures that monitored the use of  
7 -- I mean the discharge of firearms?

8 A. You were supposed to report that, but if  
9 it wasn't reported, you had no way of knowing. And  
10 again, I don't know how you would know.

11 Q. Okay. So that would be no?

12 A. That would be an "I don't know."

13 Q. Okay. All right. I need five minutes,  
14 and then I'm going to finish up. Give me five  
15 minutes. I'll come right back, we'll finish it up.

16 THE REPORTER: Okay. We're off the  
17 record. The time now is 1:04 p.m.

18 (WHEREUPON, a recess was taken.)

19 THE REPORTER: We're back on record. The  
20 time now is 1:16 p.m.

21 BY MR. SHABAZZ:

22 Q. Okay. Mr. Godfrey, at the time of the  
23 Michael Jenkins incident, you're familiar with the  
24 term "chain of command"; correct?

25 A. Yes, sir.

1 Q. We're talking about Rankin. There is no  
2 system in place?

3 A. No.

4 THE REPORTER: I need to remind you two to  
5 please speak one at a time, so I can record more  
6 clearly.

7 MR. SHABAZZ: Okay. All right. All  
8 right. I have no further questions.

9 THE DEPONENT: Excellent.

10 EXAMINATION

11 BY MR. DARE:

12 Q. I have just a handful of follow-ups.  
13 Earlier in your deposition, you made reference to a  
14 DT training. What does the DT stand for?

15 A. Defensive tactics.

16 Q. And what generally is a defensive tactics  
17 training?

18 A. It's depending on what style your  
19 particular officer chooses, it could be a Gracie  
20 jujitsu style, it could be just some standard  
21 handcuffing techniques. Generally, what it starts  
22 as, the basic handcuffing techniques. It will  
23 expand to taser use. It could expand to use of  
24 baton, less than lethal force, grappling techniques.  
25 It could be one of a number of different things.

1 Q. Based on your knowledge of training  
2 requirements on or prior to January of 2023, what  
3 did the state require of Sheriff's Department  
4 deputies as far as annual training, the state of  
5 Mississippi?

6 A. None.

7 Q. You were also asked about investigations  
8 into the Damien Cameron incident. Did I understand  
9 you correctly that you don't recall investigations  
10 by the name of the individual, is that right?

11 A. Now is that the investigation with Elward?

12 Q. So I'm going to represent to you that  
13 Damien Cameron was the individual who was  
14 unconscious in the back of Hunter Elward's vehicle.

15 A. Yeah. I know what you're talking about.

16 Q. And later died in a -- in a hospital.

17 A. Right.

18 Q. Did you ever interview Hunter Elward  
19 following the Damien Cameron incident?

20 A. Officially, no.

21 Q. Did you speak with him about the incident?

22 A. Yes. I asked him what happened one time.  
23 In general, any time somebody was involved in any  
24 kind of altercation, I would ask them what happened  
25 just for knowledge. Perhaps there's a chance to add

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1 into future training or seek proper training out.

2 Q. I think you testified to this, and I want  
3 to make sure. Now OIS is what?

4 A. Officer-involved shooting.

5 Q. And during your time at the Rankin County  
6 Sheriff's Department, how were OISs investigated, if  
7 the OIS occurred -- if a deputy with the Rankin  
8 County Sheriff's Department was involved in the OIS?

9 A. When I first got there, I remember the  
10 first one or two I think were probably investigated  
11 internally. And after that, they started assigning  
12 them to MBI. And I -- I can't give you a specific  
13 date or time that MBI started doing.

14 There were -- when I first got there, they  
15 were very rare. They were very rare when I first  
16 started there, because I remember the first one  
17 after I started there. It had been the first one  
18 they'd had in years.

19 Q. To your knowledge, was it a requirement  
20 that MBI investigate OISs for Sheriff's Departments?

21 A. Not to my knowledge. I don't know.

22 MR. DARE: Tender the witness back to you,  
23 counsel.

24 FURTHER EXAMINATION

25 BY MR. SHABAZZ:



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1 Q. Okay. So you were not the Internal  
2 Affairs officer for Rankin County at the -- at any  
3 time, Internal Affairs officer for Rankin County at  
4 any time?

5 A. We didn't have Internal Affairs officer  
6 when I was there.

7 Q. Oh. And you weren't the person  
8 responsible for investigating allegations of -- of  
9 violations of department policy by the deputies in  
10 Rankin, were you?

11 A. Not unless the Sheriff asked me to look  
12 into a particular matter.

13 Q. Okay. And that occurred rarely? I mean  
14 just on sporadic occasions?

15 A. It was pretty rare, yes sir.

16 Q. Okay. Did you -- just on investigations,  
17 did you investigate the use of force at the  
18 Sheriff's Office? Did you investigate the use of  
19 force by a gentleman by the name of Christopher  
20 Mack, who in 2021 claims that he was beaten in the  
21 jail by Rankin deputies? Early and either between  
22 January and May of 2021? Christopher Mack claimed  
23 he was beaten by a deputy at Rankin Jail. Are you  
24 familiar with that?

25 MR. DARE: I'm going to object to the --

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## 1 CERTIFICATE

2  
3 I, Nicole Smith, do hereby certify that I  
4 reported all proceedings adduced in the foregoing  
5 matter and that the foregoing transcript pages  
6 constitutes a full, true and accurate record of said  
7 proceedings to the best of my ability.

8  
9 I further certify that I am neither  
10 related to counsel or any party to the proceedings  
11 nor have any interest in the outcome of the  
12 proceedings.

13  
14 IN WITNESS HEREOF, I have hereunto set my  
15 hand this 15th day of November, 2024.

16  
17  
18 

19  
20 Nicole Smith  
21  
22  
23  
24  
25